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Report to Congressional Requesters

April 2000

COMBATING TERRORISM

How Five Foreign Countries Are Organized to Combat Terrorism



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National Security and
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Congressional Requestors

In fiscal year 1999, the federal government spent about \$10 billion to combat terrorism. Over 40 federal departments, agencies, and bureaus have a role in combating terrorism. The amount of spending and the large number of agencies involved have prompted some Members of Congress to question who is in charge of U.S. efforts to combat terrorism, how the federal government is organized to prevent and respond to terrorism on U.S. soil, and how resources are being allocated.

Based on these concerns, and recognizing that other countries have had more experience dealing with terrorist attacks within their borders, you asked us to provide information on (1) how other governments are organized to combat terrorism and (2) how they allocate their resources to combat terrorism. We selected Canada, France, Germany, Israel, and the United Kingdom for the focus of our work.¹

Over the years, we have found problems with efforts to combat terrorism in the United States. For example, we reported in 1999 that the overall command (i.e., who is in charge) at a terrorist incident was not clearly designated or agreed to among federal, state, and local governments.² In 1998, we reported that some federal resources to combat terrorism were being increased without a clear link to likely threats and that programs were being developed based on vulnerabilities, not likely terrorist attacks.³ We also reported in 1999 that these programs potentially duplicated

¹We selected these five countries based on terrorism-related activities within their borders, the type of government, and our ability to conduct work in these countries. For more details on our selection criteria, and how we conducted our work, see our scope and methodology section.

²*Combating Terrorism: Issues to Be Resolved to Improve Counterterrorism Operations* (GAO/NSIAD-99-135, May 13, 1999).

³*Combating Terrorism: Threat and Risk Assessments Can Help Prioritize and Target Program Investments* (GAO/NSIAD-98-74, Apr. 9, 1998).

existing federal emergency response capabilities.⁴ A list of related GAO products appears at the end of this report.

The information in this report describes similarities we found in how the five countries we examined are organized and how they allocate resources to combat terrorism. The appendixes provide more details on each individual country. Since our objectives were to describe the efforts of these other countries, we did not compare or contrast this information with how the United States is organized to combat terrorism and we are not making any recommendations.

Results in Brief

The five countries we examined have similarities in how they are organized to combat terrorism.

- The countries generally have the majority of organizations used to combat terrorism under one lead government ministry. However, because many other ministries are also involved, the countries have created interagency coordination bodies to coordinate both within and across ministries. For example, while many countries generally have their intelligence and law enforcement organizations under their ministries of interior or equivalent, they also need to coordinate with their ministries of foreign affairs, defense, and health or emergency services.
- The countries have clearly designated who is in charge during a terrorist incident—typically their national or local police.
- The countries have national policies that emphasize prevention of terrorism. To achieve their policies, the countries use a variety of strategies, including intelligence collection, police presence, and various security measures such as physical barriers at the entrances to public buildings.
- These countries primarily use their general criminal laws (e.g., those for murder or arson) to prosecute terrorists. The countries also have special terrorism-related laws that allow for special investigations or prosecution mechanisms and increased penalties.
- The countries' executive branches provide the primary oversight of organizations involved in combating terrorism. This oversight involves

⁴*Combating Terrorism: Observations on Federal Spending to Combat Terrorism* (GAO/NSIAD/GGD-99-107, Mar. 11, 1999).

reviewing the programs and resources for effectiveness, efficiency, and legality.

The five countries we examined also had similarities in how they allocate resources to combat terrorism. Officials in the ministries involved said they make resource allocations based upon the likelihood of threats taking place, as determined by intelligence assessments. While the officials we met with discussed resource levels in general, none of the five countries tracked overall spending on programs to combat terrorism. Such spending was imbedded in other accounts for broad organizational or functional areas such as law enforcement, intelligence, and defense. Officials in all countries told us that because of limited resources, they made funding decisions for programs to combat terrorism based on the likelihood of terrorist activity actually taking place, not the countries' overall vulnerability to terrorist attack. They said their countries maximize their existing capabilities to address a wide array of threats, including emerging threats, before they create new capabilities or programs.

Background

All five countries we visited have parliamentary style governments with various ministries that provide an array of government services. For example, a ministry of the interior may provide national law enforcement and intelligence services. In a parliamentary style of government, the executive branch has the dominant role in the development of policy and strategy. Members of the legislative branch generally make up the cabinet, which under the prime minister or the chancellor leads the executive branch of government.⁵ The prime minister or the chancellor also leads the majority political party, and because of party discipline, the majority party in the legislature does not provide an independent role and the minority party does not have much of a role in policy development.⁶

⁵For the purposes of this report, we use the term "executive branch" to refer to those ministries, departments, or organizations that perform executive-type functions. The term "legislative branch" refers to those bodies of elected representatives that enact laws such as the Parliaments in Canada and the United Kingdom, the National Assembly and Senate in France, the Bundestag and Bundesrat in Germany, and the Knesset in Israel.

⁶While minority parties generally do not have a large role in policy development, they could have a large role in a coalition government where they form a coalition and align with a larger party.

Some of the countries we visited have strong central governments, while others have strong regional or state governments. For example, Canada with its provinces and Germany with its states represent countries that have relatively strong regional governments compared to France, Israel, and the United Kingdom that have relatively strong central governments. To some extent, the division of power between the central and regional governments determines how these countries organize their efforts to combat terrorism. For example, in some countries the national police play a key role, while in other countries the regional or local police play a key role.

Officials in Canada, France, and Germany told us that the current threat from terrorism in their countries is low. According to a 1998 Department of State report on global terrorism, terrorism in Europe has declined, in part, because of the increased vigilance by security forces and the recognition by some terrorist groups that long-standing political and ethnic controversies should be addressed by negotiations. For example, the remnants of Germany's Red Army Faction, once among the world's deadliest, announced the dissolution of their organization. In Israel, officials indicated that the level of terrorism fluctuates with the peace process—terrorism typically increases when the peace process is working, as those opposed to the peace process try to derail it through violence. In the United Kingdom, officials said that terrorism related to Northern Ireland continues to take place and poses a real threat depending, in part, on developments in the peace process. They added that although activity is at historically low levels, the threat remains and is linked to developments in the peace process. Officials from all five countries cited the threat of terrorists using chemical, biological, radiological, and nuclear weapons as particularly unlikely.

Organization, Coordination, Incident Command, Policies, Laws, and Oversight Are Similar

The five countries we examined have similarities in how they are organized to combat terrorism. Specifically, each country places the majority of resources for combating terrorism under one ministry, but each recognizes that it must coordinate its efforts to develop national policy on combating terrorism so it has interagency coordination bodies. Each country also has clearly designated leadership at the scene of terrorist incidents. The five countries have policies and strategies that emphasize the prevention of terrorism using resources such as intelligence collection, police presence, and security measures. In addition, each country uses its general criminal laws (e.g., those for murder or arson) to prosecute terrorists. The countries also have special terrorism-related laws that allow for special investigation

or prosecution mechanisms, and increased penalties. In each of the five countries, the executive branch provides the primary oversight of organizations involved in combating terrorism.

Lead Organization With Policy Coordination	In four countries, most of the resources to combat terrorism—law enforcement and intelligence services—are centralized under a lead agency, generally the countries' ministry of interior or equivalent. ⁷ For example, the French Ministry of Interior includes the National Police and the two domestic intelligence agencies that have a primary role in combating terrorism. However, officials from all the countries said they view counterterrorism as an intergovernmental effort that requires coordination among law enforcement, intelligence, and other parts of the government that may be involved in combating terrorism, including foreign affairs, the military, and health and emergency services. Since they view combating terrorism as an interagency effort, officials in each country identified the prime minister or the chancellor as the one person in charge of combating terrorism. Below that level, the effort to combat terrorism requires an interagency body to formulate policy, coordinate activities, and provide recommendations to the prime minister or the chancellor. In Israel, for example, there is an interagency body called the Bureau for Counterterrorism that coordinates activities and provides advice to the prime minister regarding terrorism matters. Appendix I shows the interior ministries or equivalent that lead efforts to combat terrorism and the interagency bodies that provide coordination and advice on terrorism issues to the prime minister or the chancellor.
Clearly Designated Incident Leadership	All five countries have clearly designated who is to be in charge during a terrorist incident. For example, in the United Kingdom, the local Chief Constable (i.e., chief of police) has overall control of all aspects of handling a terrorist incident. For Israel, the National Police are in command within Israel, and the military are in command in the occupied territories. Appendix I provides details on who is designated to command at terrorist incidents for the rest of the countries.

⁷In Israel, the National Police are under one ministry; however, the main domestic and international intelligence services are not in the same ministry as the National Police and report directly to the prime minister.

Incident leadership is reinforced through written agreements and contingency plans or other agreements. For example, in Canada, the Royal Canadian Mounted Police has written agreements with major municipal police departments on who leads the incident response. The French government has written interagency contingency plans with command and control details for such terrorist situations as a heightened threat, aircraft hijacking, ship hijacking, or a chemical attack. Officials in the five countries stated that they use the agreements or plans as the basis of their exercises to practice their response, which further reinforces who leads at the incident site. Clear incident command is also strengthened because the incident commander controls all response elements, including police, fire, medical, and other emergency services. Thus, there is one commander for police activities (e.g., assaults, arrest, and gathering evidence) as well as other emergency activities (e.g., evacuation, search and rescue, medical treatment, and decontamination). Officials in the United Kingdom cited the importance of having one person—the Chief Constable—in charge of the entire response. Officials in the other four countries made similar comments on the need for clear and unified leadership for the whole range of activities in a response to a terrorist attack.

Policies and Strategies Emphasize Prevention

Each country had developed policies to combat terrorism through their experience with various terrorist groups. The five countries' national policies to combat terrorism, which were not always written, emphasized prevention. Canadian officials were the only ones to provide us with their written policies on terrorism. Officials in the other countries told us they had no written policies. To implement their national policies, these countries had strategies that included intelligence collection, police presence, and other deterrent measures.

For example, the strategies in all five countries include domestic intelligence, and each has at least one security intelligence organization that gathers intelligence on domestic terrorist activities. Officials we spoke with said that an effective intelligence capability is essential for preventing acts of terrorism in their countries. In general, the role of their domestic security intelligence organizations is to prevent acts of terrorism by gathering information through a variety of sources and methods; assessing the threats to security; and monitoring and sometimes disrupting the activities of certain groups considered to be a threat within the country.

All of the countries' domestic intelligence organizations are separate from their law enforcement organizations. In Canada, France, and the United

Kingdom, these organizations are under a single ministry. In Germany there are parallel federal and state intelligence and law enforcement organizations, and both are under their respective ministries of the interior. In Israel, the intelligence organizations report directly to the prime minister, and the national police are under the Ministry of Public Security. Cooperation between both law enforcement and intelligence organizations was cited by officials in all five countries as important, in part, because the domestic intelligence organizations do not have powers of arrest. Law enforcement organizations become involved in combating terrorism when information from the intelligence services indicates that criminal activity has occurred, or is likely to occur, or when their own criminal intelligence sources indicate such. Appendix II shows the principal law enforcement and intelligence organizations of the countries we visited.

In addition to a strong intelligence capability, we found that the countries' strategies included using a visible police presence to prevent acts of terrorism. For example, in France, when there is a specific terrorist threat, law enforcement increases its public presence in a visible show of force. Likewise, the German Federal Border Police can provide additional manpower to supplement state police at events such as political demonstrations. In Israel, the National Police, as well as military personnel, is present at various locations throughout the metropolitan areas to respond to incidents as needed.

As part of their prevention strategies, the five countries use a variety of other techniques to deter terrorist attacks. For example, all five countries use physical barriers in certain critical areas and government buildings to deter direct attacks. Other techniques are as follows. In Israel, individuals and their belongings are often physically searched by police, defense personnel, or security contractors and pass through metal detectors before entering such places as shopping centers, airports, and local attractions. In the United Kingdom, police use video cameras to monitor daily events and watch for suspicious activity in London. In France, persons entering government buildings typically walk through metal detectors.

Countries Use Combination of General and Specific Laws

All five countries use their general criminal laws to prosecute offenses committed during a terrorist act, such as the crimes of murder, arson, kidnapping, and hijacking. According to Canadian officials, treating terrorism as ordinary crime removes the political element and thereby dilutes the effectiveness of the terrorist act. The countries have also enacted a variety of special laws that relate to terrorism that may include a

statutory definition or description of terrorism, or may invoke special investigation or prosecution procedures, or provide for increased penalties. Under French law, certain criminal offenses are considered terrorism when the acts are intentionally linked to an individual or group whose purpose is to cause a serious disruption of public order through intimidation or terror. Penalties may be increased if a criminal offense is related to such terrorism. France also has special judicial procedures to address terrorism such as special courts and prosecutors. Germany's criminal code has a special prohibition against the formation and support of a terrorist association. In addition to its general criminal laws, Israel has two principal laws that govern terrorism that contain a number of criminal offenses such as supporting terrorist organizations. The United Kingdom has two principal terrorism laws that designate a number of criminal offenses relating to membership in and support of terrorist organizations. Appendix III provides additional information on the terrorism-related laws in the five countries.

Executive Branch Provides Oversight

Oversight reviews of programs and resources for effectiveness, efficiency, and legality are primarily the responsibility of those ministers in the executive branch that have a role in combating terrorism. Officials told us that in their parliamentary style of government, ministers are accountable for oversight and that this function is embedded in the ministers' responsibilities. They generally viewed oversight as an ongoing routine function of agency management, not an independent or separate review function. For example, in France, the Minister of the Interior, through their daily activities, reviews or oversees the activities of those resources within the Ministry.

The legislatures in these countries do not hold oversight hearings or write reports that evaluate programs to combat terrorism. In these parliamentary style governments, the legislative branches do not provide ongoing independent oversight of efforts to combat terrorism. While the five countries do conduct some legislative review of national security activities (e.g., through designated legislative committees), these reviews generally have not focused on activities to combat terrorism. At times, some members of the legislative branch are included in standing or ad hoc executive oversight bodies. In Canada and Israel, independent reviews of activities to combat terrorism are done by their national audit agencies. Appendix IV summarizes oversight organizations and functions in the five countries we visited.

Resource Allocations Based on Threat Assessments

Officials in the ministries involved in combating terrorism within the five countries we visited said they made resource allocations based upon the likelihood of threats taking place, as determined by intelligence assessments. While the officials we met with discussed resource levels in general, none of the five countries tracked overall spending on programs to combat terrorism. Such spending was imbedded in other accounts for broad organizational or functional areas such as law enforcement, intelligence, and defense. Due to resource constraints, they said their countries maximize their existing capabilities to address a wide array of threats, including emerging threats, before they create new capabilities or programs.

Resource Allocations Targeted at Likely Threats, Not Vulnerabilities

The five countries we reviewed receive terrorist threat information from their civilian and military intelligence services and foreign sources. Using various means, each of the countries' intelligence services continuously assess these threats to determine which ones could result in terrorist activity and require countermeasures, which ones may be less likely to occur but may emerge later, and which ones are unlikely to occur. Officials in all countries told us that because of limited resources, they made funding decisions for programs to combat terrorism based on the likelihood of terrorist activity actually taking place, not the countries' overall vulnerability to terrorist attack. For example, each of the countries may be vulnerable to a chemical, biological, radiological, or nuclear attack by terrorists, but officials believe that such attacks are unlikely to occur in the near future for a variety of reasons, including the current difficulty in producing and delivering these types of weapons. Furthermore, officials in one country told us that the effects of these types of weapons would alienate the population from the political aim of the terrorist groups and therefore did not view this type of attack as likely. Officials we spoke with believed that conventional bombs and other traditional means, such as hijacking, are more likely to occur.

Countries Maximize Existing Capabilities to Respond to Emerging Threats

For less likely but emerging threats, officials in the five countries told us that they generally try to maximize their existing capabilities for responding to such threats, rather than create new programs or capabilities. For example, the same capabilities used to respond to a fire, industrial explosion, or chemical spill would be used for a terrorist incident involving chemical, biological, radiological, or nuclear weapons. In addition, officials in each country said additional capabilities from

neighboring states, provinces, cities, or national governments could be used by local authorities if the situation exceeded their capabilities. For example, Germany plans to rely on existing capabilities within the states rather than develop new federal capabilities. Likewise, Israel has not developed new capabilities, but it has a nationwide program that provides gas masks and training to its citizens for defense against chemical or biological attack in wartime that officials said has use for terrorist attacks. The countries generally did not have major training programs in place to train emergency response personnel for chemical, biological, radiological, or nuclear attacks. However, the United Kingdom has a limited program to train selected police officials as incident commanders and is considering a training program for response personnel in selected locations. Also, Canada has launched a policy initiative to develop a strategy to strengthen national counterterrorism response capability, particularly the ability to respond to chemical, biological, radiological, and nuclear terrorist attacks. Only France has created new capabilities to respond to chemical, biological, radiological, and nuclear terrorist attacks.

Country Comments

We provided a draft of this report to officials from all five countries for their review and comment. All of the officials provided us with oral comments indicating they agreed with the report's overall content and our description of their countries' efforts. Officials from Canada and the United Kingdom also provided written comments of a technical nature, and we incorporated their changes where appropriate.

Scope and Methodology

We examined how Canada, France, Germany, Israel, and the United Kingdom were organized to combat terrorism. In selecting these countries, we considered the historic level of terrorism and related activities within their borders, the type of government, and our ability to conduct work in the countries. We also consulted with officials from the U.S. State Department's Office of the Coordinator for Counter Terrorism and other experts in the field of terrorism inside and outside the federal government about which countries we should examine. Based on our criteria and these consultations, we selected Canada, France, Germany, Israel, and the United Kingdom.

Our scope was limited by two factors. First, we did not have audit authority in the five countries; thus, we relied on the cooperation of foreign officials. While we had numerous meetings with officials in the five countries, we

usually did not have access to many of their internal documents, classified plans, or policy evaluations. Second, we were in each country for a relatively short time, ranging from 1 to 2 weeks. As a result of these limitations, we sought to describe how each country organized its programs to combat terrorism, not to evaluate the operations or the effectiveness of those programs. For our review of terrorism-related laws, we relied on officials to identify appropriate statutes and did not do our own comprehensive research or analysis of the countries' laws.

Because of the limitations we faced in reviewing foreign countries' policies and programs, we asked the foreign officials to comment on the accuracy of our work. After we conducted our overseas visits, we wrote summaries documenting our observations and conclusions and sent them to the officials for their verification, review, and comment. All of the officials provided written comments, and we made changes to our summaries as appropriate. We then used these summaries as the basis for drafting this report.

Our overall methodology consisted of reviewing applicable documents and interviewing a broad array of national-level government officials whose organizations had a significant role in combating terrorism. Where possible, we met with regional and local government officials in the countries we visited. We also met with contacts outside the government to provide us with different perspectives on the countries' efforts to combat terrorism. For example, we met with experts from academia, research organizations, the media, and other nongovernmental organizations. For our specific objectives, we interviewed officials at the level of government most able to provide us information on our topics.

To describe how the five governments were organized to combat terrorism, including oversight of terrorism programs, we met with officials from the prime minister's or chancellor's office; legislative committee members with responsibility regarding counter terrorism programs; and officials within the ministries of interior, justice, defense, and other ministries that had a role in combating terrorism. We also met with officials that have direct responsibility for responding to and managing a terrorist incident. These included officials who represented the countries' national police, intelligence, military, and emergency medical organizations. To describe oversight of terrorism programs, we met with members of legislative committees, and national audit organizations and officials of inspector general offices where they were present.

To describe how the countries allocate their resources to combat terrorism, we met with many of the same officials above and focused our discussions on how they analyzed threats and allocated resources for these programs.

We conducted our review from May 1999 through January 2000 in accordance with generally accepted government auditing standards.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution of this report until 30 days after its issue date. At that time, we will send copies to appropriate congressional committees and the federal agencies that combat terrorism. We will also make copies available to other interested parties upon request.

If you have any questions about this report, please contact me or Ray Decker, Acting Associate Director for National Security Preparedness Issues, at (202) 512-5140. Other major contributors to this report are listed in appendix V.



Norman J. Rabkin
Director, National Security Preparedness Issues

List of Congressional Requesters

The Honorable Ted Stevens
Chairman
The Honorable Robert Byrd
Ranking Member
Committee on Appropriations
United States Senate

The Honorable Christopher S. Bond
Chairman
The Honorable Barbara Mikulski
Ranking Member
Subcommittee on Veterans Affairs, Housing and
Urban Development and Independent Agencies
Committee on Appropriations
United States Senate

The Honorable Ike Skelton
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Christopher Shays
Chairman
Subcommittee on National Security, Veterans
Affairs, and International Relations
Committee on Government Reform
House of Representatives

Security-Related Policy Development and Incident Leadership in Canada, France, Germany, Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Interagency policy coordination body	Privy Council Office is the office that provides advice to the prime minister and the cabinet on terrorism issues. The Privy Council Office obtains input from the Solicitor General's Office for national policy and the Ministry of Foreign Affairs for international policy.	Interministerial Liaison Committee Against Terrorism (Comité Interministériel de Lutte Anti-Terroriste) is a high level committee that develops policy and includes the Prime Minister and Ministers of Interior, Defense, Justice, and Foreign Affairs. Anti-Terrorism Coordination Unit (Unité de Coordination de la Lutte Anti-Terroriste) is a working level coordination group that includes agencies from the Ministries of Interior and Defense that coordinate operations.	Coordinator for Intelligence (Koordinierung der Nachrichtendienste des Bundes) is a direct advisor to the Chancellor and develops a general policy framework and coordinates state issues. The Federal Ministry of the Interior includes police, intelligence, and border police, and provides federal policy for combating terrorism.	Bureau for Counterterrorism makes recommendations on terrorism policy and works with agencies involved in combating terrorism to formulate recommendations. The Bureau includes representatives from all agencies involved in combating terrorism and reports directly to the Prime Minister.	Official Committee on Terrorism coordinates interagency counter-terrorism policy development with input from the organizations directly involved in combating terrorism (Home Office, Foreign and Commonwealth Office, and Association of Chief of Police Officers).
Organization with primary responsibility for combating terrorism	Solicitor General is the ministry that includes the intelligence and law enforcement resources for combating terrorism. Within this ministry the Canadian Security Intelligence Service provides the overall threat assessment for Canada and the Royal Canadian Mounted Police provides law enforcement.	Ministry of Interior (Ministère de L'Intérieur) hosts the interagency Anti-Terrorism Coordination Unit. This ministry includes the National Police, the Central Headquarters for Surveillance of the Territory, and the General Intelligence Central Service.	State-level Ministries of Interiors (Staatsministerium des Innern) includes police, intelligence, and emergency preparedness. Each state ministry of interior is represented in a Council of Interior Ministers that addresses a variety of intelligence, law enforcement, and emergency preparedness issues.	Ministry of Internal Security includes resources to combat terrorism—the National Police and the Border Guard. Ministry of Defense provides law enforcement in the occupied territories and the Home Front Command—a command within the military—provides civil assistance management through out Israel.	Home Office is equivalent to an Interior Ministry and manages domestic terrorism programs. It has purview over law enforcement, domestic intelligence, and emergency management.

Continued

Appendix I
Security-Related Policy Development and
Incident Leadership in Canada, France,
Germany, Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Leadership during an incident	Royal Canadian Mounted Police is Canada's national police force. Canada also has municipal police in larger cities. The Mounted Police and municipal police forces have memorandums of understanding describing how law enforcement will be coordinated and who will be in charge. The Royal Canadian Mounted Police are under the Ministry of the Solicitor General.	Préfet is a regional political appointee who supervises police and emergency activities at a terrorist scene.	Federal police would take command over the terrorist incident upon direction of the federal prosecutor, or at the request of the state. The federal criminal police (Bundeskriminalamt) are under the federal ministry of interior. First responders would be the state police (Ländeskriminalamt) under the state's interior ministry. State police would provide support to their federal counterparts.	National Police or Military are in charge of a terrorist incident in Israel, depending on the location of the incident. In the occupied territories, the military responds to and remains in charge of a terrorist incident. In the rest of Israel, the National Police respond to an incident and remain in charge throughout the incident.	Local Chief Constable is the official in charge at the incident and decides whether to bring in other support as needed. The entire government works to support the police at the scene.

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Note: For overseas terrorist incidents involving its citizens, the Ministry of Foreign Affairs or equivalent in each country typically provides input to the interagency coordination body on terrorism policy.

Source: Our interviews with selected officials and review of documents from each country.

Principal Law Enforcement and Intelligence Organizations in Canada, France, Germany, Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Law Enforcement Organizations	Royal Canadian Mounted Police is the national police force that has primary responsibility for prevention, protection, and investigation of offenses that constitute a threat to the security of Canada. They also serve as provincial and municipal police in many areas across Canada and are under the Ministry of the Solicitor General. Two provinces and most municipalities have their own police forces. Many have agreements with the Royal Canadian Mounted Police to facilitate cooperation during terrorist incidents.	National Police (Direction Générale de la Police Nationale) is the lead civilian national police force that has jurisdiction in large urban areas. It is divided into specialized directorates for such functions as border security and protection of dignitaries and is under the Ministry of the Interior. National Gendarmerie (Direction Générale de la Gendarmerie Nationale) is responsible for law enforcement in small towns and rural areas and is under the Ministry of Defense.	Federal Criminal Police (Bundeskriminalamt) is responsible for protection and investigation of acts of terrorism and extremism and is under the Ministry of the Interior. State Criminal Police (Ländeskriminalamt) is responsible for criminal investigations within the states and may assist the federal police during terrorism cases. Under the states' ministries of interior. Federal Border Guard (Bundesgrenzschutz) provides security at the borders, transportation sites, and other federal areas. It assists state police when large forces are needed and is under the Ministry of the Interior.	Israeli National Police is the principal civilian police force and is under the Ministry of Public Security. Border Guard is the National Police's principal mobile task force, focuses on internal security, and has a special antiterrorist unit. Israeli Defense Force provides law enforcement in the occupied territories.	County Police Forces. Each county or group of counties has a police force led by a chief constable. The Metropolitan Police Service in London has the Anti-Terrorist Branch, which the chief constables of other police forces can call on for assistance.

Continued

Appendix II
Principal Law Enforcement and Intelligence
Organizations in Canada, France, Germany,
Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Domestic Intelligence Organizations	Canadian Security Intelligence Service is responsible for collection, analyses, production, and dissemination of security intelligence on terrorism. It participates in information sharing with allied countries but does not independently conduct operations abroad and is under the Ministry of the Solicitor General.	Central Headquarters for Surveillance of the Territory (Direction de la Surveillance du Territoire) is responsible for intelligence regarding internal threats from external sources and is under the Ministry of the Interior, Director of the National Police. General Intelligence Central Service (Direction Centrale des Renseignements Généraux) is responsible for intelligence regarding internal threats from internal sources and is under the Ministry of the Interior, Director of the National Police.	The Federal Office for the Protection of the Constitution (Bundesamt für Verfassungsschutz) collects and analyzes intelligence relating to politically motivated extremism, including terrorism, and coordinates with its state counterparts. Under the Ministry of the Interior. State Offices for the Protection of the Constitution (Landesämter für Verfassungsschutz) have similar roles but are independent of the federal government and are under the states' ministries of interior.	Israeli Security Agency is responsible for internal intelligence collection and analyses, counterespionage, and the prevention of terrorist acts. It reports directly to the Prime Minister and is formerly the General Security Service.	British Security Service gathers intelligence internally to investigate and disrupt terrorist activity, provide advice to the government on domestic security matters, and issue threat assessments. It reports directly to the Home Office and/or the Prime Minister and is also known as MI-5.
Other Intelligence Organizations	Department of National Defense established intelligence response teams to produce intelligence for supporting senior officials, planners, and the Department's hostage rescue unit. Communications Security Establishment gathers intelligence through electronic means and is responsible for protecting information technology infrastructure.	General Headquarters for Security Overseas (Direction Générale de la Sécurité Exterieure) is responsible for intelligence gathering abroad and is under the Ministry of Defense. Central Headquarters Military Intelligence (Direction Renseignements Militaire) collects and analyzes military intelligence and is under the Ministry of Defense.	German Intelligence Service (Bundesnachrichtendienst) is responsible for the investigation of threats from abroad. Military Intelligence Service (Militärischer Abschirmdienst) focuses on intelligence matters that are relevant to military affairs and is under the Ministry of Defense.	Mossad is Israel's primary foreign intelligence service and reports directly to the prime minister. Ministry of Defense has a section that focuses on military intelligence and works with the Mossad and the Israeli Security Agency to prepare the annual threat assessment.	Secret Intelligence Service is Britain's lead foreign intelligence service. Under the Foreign and Commonwealth Office it reports directly to the Prime Minister and is also known as MI-6. Government Communications Headquarters collects communications intelligence.

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Source: Our interviews with selected officials and review of documents from each country.

Principal Terrorism Laws, Definitions, and Other Legal Information in Canada, France, Germany, Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Principal terrorism-related laws	Security Offenses Act (1984) and Canadian Security Intelligence Service Act (1984)	Chapters I and II of title II (Terrorism) of the Penal Code and the Code of Criminal Procedure	Section 129(a) of the Criminal Code	Defense and Emergency Act (1945) and the Prevention of Terrorism Ordinance (1948)	Prevention of Terrorism (Temporary Provisions) Act of 1989 and the Northern Ireland (Emergency Provisions) Act of 1998
Definition or description of terrorism	Canadian Security Intelligence Service Act does not explicitly define terrorism but applies to "threats to the security of Canada." Such threats include "activities within or relating to Canada directed toward or in support of the threat or use of acts of serious violence against persons or property for the purpose of achieving a political objective within Canada or foreign state."	The Penal Code ties terrorist-related acts, defined as "an act by an individual or group that uses intimidation or terror to disrupt public order," to the Code's general criminal offenses. Officials told us that although this definition does not mention political motivation, an act would not be labeled an act of terrorism unless it was linked to some political motive or cause.	German law does not define terrorism, but a working definition provided by German government officials states that terrorism is the permanent fight for political goals and change of the political system through assaults against persons and property.	Neither law specifically defines terrorism, but the Prevention of Terrorism Ordinance contains criminal prohibitions regarding a person's activities and association with a "terrorist organization." Such an organization is defined as a "body of persons resorting in its activities to acts of violence calculated to cause death or injury to a person or to threats of such acts of violence."	Both acts define terrorism as "the use of violence for political ends [including] any use of violence for the purpose of putting the public, or any section of the public in fear."

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Appendix III
Principal Terrorism Laws, Definitions, and
Other Legal Information in Canada, France,
Germany, Israel, and the United Kingdom

	Canada	France	Germany	Israel	United Kingdom
Other legal information	Under the Security Offenses Act, the federal government, rather than a provincial or territorial government, prosecutes criminal offenses that constitute a threat to the security of Canada, or if the victim of the offense is an internationally protected person. The specific offenses, however, are still prosecuted under Canada's federal criminal laws.	The maximum allowable criminal sentences are increased when certain criminal offenses, such as violent conduct, hijacking, or the use of explosives, are linked to terrorism. France has a special national court to address acts of terrorism under the Justice Ministry, which also permits this special independent section to investigate, prosecute, and adjudicate cases associated with terrorism.	Section 129(a) prohibits the formation or support of an association whose objectives or activities are directed toward committing murder, genocide, or certain other criminal acts against personal liberty or endangering the public. Convicted persons can be barred from holding public office and acquiring rights from public elections. While most violations of the criminal code are prosecuted by the states, the national government can direct the overall investigation and determine if the state or federal police will conduct the investigation when violations of section 129(a) are suspected or when the crime has national consequences.	The Defense and Emergency Act, a holdover from the British Mandate of Palestine, is used primarily in the occupied territories for administrative enforcement purposes such as seizure of property. The Prevention of Terrorism Ordinance, developed during the origin of the State of Israel, contains both judicial and administrative provisions, as well as criminal prohibitions against membership and support of a terrorist group. According to Israeli officials, they are studying ways to update and strengthen their terrorism laws.	The Northern Ireland (Emergency Provisions) Act of 1996, only applies to Northern Ireland. The Prevention of Terrorism (Temporary Provisions) Act of 1989, applies to the United Kingdom in general. Both acts contain a number of comparable criminal offenses relating to membership, participation in, and support of proscribed organizations. Subject to Parliamentary agreement, these temporary laws will be replaced later this year by one permanent law that would apply throughout the country and to all forms of terrorism.

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Note: This table is based upon laws that country officials identified as their key statutes related to terrorism. It is not based upon a comprehensive review of statutes in the countries.

Source: Our interviews with country officials and review of legal documents they provided.

Security-Related Oversight Organizations and Functions in Canada, France, Germany, Israel, and the United Kingdom

Level of review or oversight	Canada	France	Germany	Israel	United Kingdom
Executive	Privy Council Office monitors and coordinates activities related to security and intelligence. Within the Privy Council Office is the Security and Intelligence Coordinator that monitors such activities on a day-to-day basis. Canada also has interdepartmental committees, including the Interdepartmental Committee on Security and Intelligence.	Interministerial Liaison Committee Against Terrorism (Comité Interministériel de Lutte Anti-Terroriste) consists of high-level officials involved in combating terrorism.	Office of the Chancellor, Coordinator for Intelligence, provides executive oversight for national issues.	National Security Council, formed in 1999, provides broad review of security issues. Israel's Security Cabinet also provides executive review and consists of the principle ministers who have a role in combating terrorism.	The Cabinet Office reviews national security issues for the Prime Minister. The Home Secretary is responsible for the British Security Service. The Foreign and Commonwealth Secretary is responsible for the Secret Intelligence Service and the Government Communications Headquarters. Other executive committees are the Permanent Secretaries' Committee on the Intelligence Services and the Ministerial Committee on Intelligence Services.
Legislative	The Special Senate Committee on Security and Intelligence reviewed counterterrorism in 1998; additional reviews are done on an ad hoc basis. For intelligence and police protection issues Canada has the Security Intelligence Review Committee, the Royal Canadian Mounted Police Public Complaints Commission, and the Royal Canadian Mounted Police External Review Committee.	Commissions are formed if problems are found.	The Parliament has a standing committee on Internal Affairs that monitors the police and the intelligence services' compliance to the law (usually in response to a specific incident).	Subcommittee on Intelligence is part of the standing committee on Foreign Affairs and Defense.	Senior parliamentarians sit on the Intelligence and Security Committee. Parliamentarians also served as Commissioners for the British Security Service and the Secret Intelligence Service to review law enforcement and intelligence activities. There is also a parliamentary tribunal to investigate public complaints.

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Appendix IV
Security-Related Oversight Organizations
and Functions in Canada, France, Germany,
Israel, and the United Kingdom

Level of review or oversight	Canada	France	Germany	Israel	United Kingdom
Other	Auditor General, Canada's independent government audit organization, reported on counterterrorism activities in 1996 with a follow-up report in 1998. Canada also has an inspector general only for intelligence issues that reports to the Solicitor General.	The Court of Accounts (Cour des Comptes), is France's independent government audit organization, but it has not focused on counterterrorism issues.	The Federal Court of Audit (Bundesrechnungshof), Germany's federal auditor conducts fiscal audits, and each government department's internal inspectors monitor compliance with internal regulations.	State Comptroller's Office has broad authority and can choose its agenda. Issued a report on Israel's overlapping intelligence activities in 1999.	The National Audit Office, the United Kingdom's national government audit organization has not focused on counterterrorism issues.

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Note: In all the countries, their judicial systems served a final oversight function over the legality of executive branch activities in criminal prosecutions.

Source: Our interviews with country officials and review of documents from each country.

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